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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

COMMODITY FUTURES TRADING
COMMISSION,

Plaintiff,

v.

TRADERS GLOBAL GROUP INC., a New
Jersey corporation, d/b/a “My Forex Funds”;
TRADERS GLOBAL GROUP INC., a
Canadian business organization; and
MURTUZA KAZMI,

Defendants.

Civil Action No. 3:23-cv-11808-ZNQ-TJB

**CERTIFICATION OF ERIC DAUCHER IN SUPPORT OF TEMPORARY
RECEIVER’S APPLICATION TO EMPLOY NORTON ROSE FULBRIGHT
US LLP AND NORTON ROSE FULBRIGHT CANADA LLP, AS SPECIAL
COUNSEL**

ERIC DAUCHER, of full age, hereby certifies, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a partner of the law firm of Norton Rose Fulbright US LLP (“NRF US,” collectively, along with Norton Rose Fulbright Canada LLP, “NRF”) and a member of the firm’s Restructuring group based in NRF US’s offices located at 1301 Avenue of the Americas, New York, NY 10019-6022. I am an attorney admitted to practice before the courts of the State of New York. I submit this certification (the “Certification”) in support of the application (the

“Application”),¹ dated September 18, 2023, of Anthony Sodono, III, in his capacity as Temporary Receiver for the Receivership Defendants, to retain NRF as his special counsel in the above-captioned matter and as otherwise described in the Application.

2. The facts set forth below are based upon my personal knowledge or discussions with other partners and associates of NRF, and client/matter records of NRF reviewed by myself or by associates of NRF acting under my supervision and direction.

3. NRF US and Norton Rose Fulbright Canada LLP (“NRF CA”) are separate legal entities and are members of Norton Rose Fulbright Verein, a Swiss Verein (“NRF Verein”). NRF Verein helps coordinate the activities of the member firms but does not itself provide legal services to clients.

4. NRF possesses the requisite experience in the fields of, among others, litigation, general corporate law, receiverships, securities and commodities laws and regulations, reorganization and restructuring, insolvency, bankruptcy, cryptocurrency, digital assets, and related matters, including, but not limited to, special expertise in cross-border restructuring and insolvency matters and Canadian securities law and proceedings before the Ontario Securities Commission and the Capital Markets Tribunal, as well as access to its global platform. In connection with this representation, NRF has assembled a highly qualified team of attorneys with experience in securities litigation, domestic and cross-border insolvency and bankruptcy, and cryptocurrency and digital assets to assist the Temporary Receiver in connection with the matters covered by the Application.

5. The NRF team consists primarily of (i) Linda Fuerst, a senior partner in NRF CA,

¹ Capitalized terms used but not otherwise defined herein shall have the respective meanings ascribed to such terms in the Application.

and Evan Cobb, a partner in NRF CA, both of whom are located in the firm's Toronto office, and (ii) the undersigned, a partner in NRF US, and James A. Copeland, a senior counsel in NRF US, both of whom are located in the firm's New York office. Other NRF attorneys may provide periodic assistance as well. All attorneys comprising or employed by NRF who will render services in this matter are duly admitted to practice law in their applicable jurisdictions, including, for example, New York, New Jersey, and/or Ontario, Canada (or, in the case of first-year associates, law clerks, or trainees, are in the process of applying for admission).

6. NRF intends to carefully coordinate its efforts with the efforts of the Temporary Receiver and his professionals, including his counsel, McManimon, Scotland & Baumann, LLC, as well as any applicable governmental units or regulators, and to work to clearly delineate its duties so as to prevent needless duplication of effort. We expect that the other professionals will do likewise. Rather than resulting in any unnecessary expense to the estates of the Receivership Defendants (collectively, the "Receivership Estate"), we anticipate that the efficient coordination of efforts among the firms and other applicable parties will greatly add to the progress and effective administration of the Receivership Estate.

7. At the request of the Temporary Receiver, NRF has agreed to a fifteen percent (15%) discount to its standard hourly rates for all attorneys and paraprofessionals involved in NRF's representation of the Temporary Receiver. The Temporary Receiver's core team at NRF (as of the date hereof) and their current, discounted hourly rates are as follows, in USD:

Eric Daucher (Partner, NRF US)	\$875
James A. Copeland (Senior Counsel, NRF US)	\$816
Evan Cobb (Partner, NRF CA)	\$650
Linda Furest (Senior Partner, NRF CA)	\$830

The current, discounted hourly rates for other members or associates of NRF that may, if appropriate, render services to the Temporary Receiver are as follows, in USD:

Partners	\$450 to \$1,445
Senior Counsel (NRF US only)	\$497 to \$1,147
Special Counsel/Of Counsel	\$442 to \$1,177
Senior Associates	\$400 to \$854
Associates	\$276 to \$846
Paraprofessionals	\$140 to \$443

8. NRF reserves the right to adjust its hourly rates in the ordinary course of its business and to seek reimbursement for expenses and disbursements.

9. Neither I, NRF, nor any member thereof insofar as I, after due inquiry, have been able to ascertain, is or has been a creditor, an equity security holder, an insider of the Receivership Defendants, or has any other relationship with the Receivership Defendants or their agents, creditors, or other parties in interest, or their respective attorneys. Moreover, NRF claims no interest in the suit or any of the parties thereto in any way which would disqualify it from serving the Temporary Receiver in good faith as a fiduciary for all of the beneficial owners and creditors of the estate, as contemplated by L. Civ. R. 66.1(g) of the Local Civil Rules of the United States District Court for the District of New Jersey.

10. Except as stated herein, neither I, NRF, the NRF Verein, nor any member thereof, insofar as I have been able to ascertain after due inquiry:

- a. represents entities other than the Temporary Receiver in connection with the matters upon which NRF is to be engaged;
- b. has an interest materially adverse to the interests of the Commodity Futures Trading Commission, the Ontario Securities Commission, the Temporary Receiver, or the Receivership Estate, or any known parties in interest or class of creditors of the Receivership Defendants in respect of the matters upon which NRF is to be engaged; or
- c. has any material connection to (i) the Receivership Defendants, the

Receivership Estate, or any known class of creditors of the Receivership Defendants; (ii) any other parties in interest herein, or (iii) their respective attorneys or accountants.

11. Moreover, neither I, NRF, the NRF Verein, nor any member thereof, will, upon being retained, represent any other entity having an adverse interest in connection with this case to the interests of the Temporary Receiver, the Receivership Estate, or any known class of creditors of the Receivership Defendants.

12. NRF US and NRF CA, as members of a Swiss Verein that is currently comprised of five separate law firms that operate all over the world with eleven (11) United States and over thirty (30) international offices. NRF Verein members collectively employ over 3,700 attorneys and paraprofessionals worldwide and have a large and diverse legal practice that encompasses the representations of many financial institutions, commercial corporations and other business entities, some of which may hold claims against the Receivership Defendants, or which otherwise may have an interest in the case. In connection with the Application, NRF performed a review of connections and relationships between members of the NRF Verein and the Receivership Defendants, including certain related parties and/or aliases. In light of the extensive number of creditors and other parties in interest, as well as the great number of NRF Verein attorneys and paraprofessionals, and its members' extensive worldwide client base, neither I nor the firm can conclusively state that all potential relationships or connections have been identified. In addition, I am also not aware, as of the date of this certification, of the identity of the Receivership Defendants' creditors or the beneficial holders of any of the Receivership Defendants' debt and/or equity securities, if any. NRF does not believe there are conflicts with any other known interested parties in respect of the above-captioned matter, but we will continue to review and update our

disclosures in this regard as and to the extent additional interested parties come to our attention.

13. Any and all fees and disbursements to NRF in connection with legal services rendered to the Temporary Receiver during the course of this proceeding will be made only after application and authorization by this Court, upon notice to (i) the Commodity Futures Trading Commission; (ii) the Receivership Defendants and counsel; and (iii) other parties filing notices of appearance, unless the Court orders otherwise.

I certify that the foregoing statements made by me are true and correct to the best of my knowledge, information, and belief.

Dated: September 19, 2023
New York, New York

/s/ Eric Daucher
Eric Daucher
Partner
Norton Rose Fulbright US LLP